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Kelly & Wallace Co., L.P.A.
Attorneys at Law

Michael P. Kelly
Bruce S. Wallace
Timothy J. Kelly

January 3, 1995

Bill Reynolds
7013 St. Rte. 221
Georgetown, Ohio 45121

Dear Mr. Reynolds:

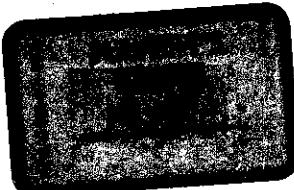
I have been contacted by Flora Prather concerning some problems she has had with you for some period of time. Given the types of complaints she has given to me, I am surprised she has not discussed this with the Prosecuting Attorney in order to have criminal charges filed against you. Nonetheless, she has indicated that she would prefer attempting to resolve matters without involving the Prosecutor if possible. However, I have advised her that if these problems continue she should contact the Prosecutor immediately in order to have something done.

She has informed me that you are in the habit of calling her house in the middle of the night in order to complain about dogs barking in the neighborhood. In addition, I am told that you use foul language and that you call repeatedly in order to attempt to prevent her from being able to get a good night's sleep. First of all, the dogs that are barking are not her dogs and are not dogs that belong to anyone that rents from her. Therefore there is absolutely no reason for you to be calling her about the problem. Your continued calling constitutes telephone harassment under Ohio Revised Code Section 2917.21 and is a misdemeanor of the first degree.

Mrs. Prather has also informed me that you took it upon yourself to enter her property and move her mailbox without her permission and without any authority to do so. This is clearly an illegal act and violates section 2911.21, criminal trespass, of the Ohio Revised Code as well as 2909.07, criminal mischief. Both offenses are crimes which carry potential jail sentences and fines.

Due to your actions and attitudes, Mrs. Prather has had trouble keeping renters on her property. They have complained to her that they got tired of being verbally abused by you and were afraid you may cause injury to them.

I am also told that you have shot your gun at children in the area and have also left a board on the ground with nails sticking up in order to cause a flat tire to the mailman's vehicle. Furthermore, you are slandering Mrs. Prather, Dwayne Daugherty and Eunice Adae, Mrs. Prather's daughter, to numerous people around Higginsport.



BILL REYNOLDS
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There is absolutely no excuse for this type of behavior and this letter is simply a courtesy to you to advise you that it must stop immediately or else both criminal and civil remedies will be sought.

Sincerely,

Timothy J. Kelly/mcb

Timothy J. Kelly
Attorney at Law

TJK/mcb

cc: Flora Prather

Little Timmy Kelly
108 S. High St.
P.O.Box 3740
Mt. Orab, Ohio 45154

Subject: Your Client Flora Prather.

Dear Mr. Kelly;

I have received your letter of 1/3/95. Before actually reading it, I had commented on what a fine quality of stationery your office was using. My exuberance however was short lived as I was once again reminded of other things I had seen written on paper, during both my Military and Civilian careers. The most fond of these memories is the fact that a piece of paper will lay right there and allow any "Ding-Bat" or Professional for that matter, to write anything upon it their little old heart desires.

I find your having addressed your letter to: Bill Reynolds etc.etc. to be in very poor taste considering you don't know me, coupled with the fact you are supposed to be an L.P.A. outfit!! L.F.A. and what you actually did seems to me to be a contradiction in terms, wouldn't you say?? Since you took your liberties with my "Nick-Name" as a member of an L.P.A., I felt turn about was fair play, thus my addressing this reply to: "Little Timmy Kelly"etc.etc. Goes down kind of hard doesn't it, especially comming from a total stranger, don't you agree?? From this day forward all corespondence from your office to me, is to be addressed to: Colonel William D. Reynolds or Mr. William D. Reynolds.

Now as to the actual contents of your letter, I find it to be Frivilous, Lacking in Foundation and as such has has been a waste of my time and your paper!! The charges outlined do not have any "Merit" what-so-ever! I do find your letter to carry overtones of out and out "Threats"!! I'm anxious to see the reply I get from the O.B.A. about your letter.

If you and or your client Flora Prather are intent in pursuing "Formal Litigation" just jump right in the water is fine, but do remember it also, runs very very deep.

Respectfully Yours

Col. William D. Reynolds
Col. William D. Reynolds
7013 St. Rt. 221
Georgetown, Ohio 45121

cc: wdr